

E FILED ON 9/10/09  
THOMAS E. CROWE, ESQ.  
THOMAS E. CROWE PROFESSIONAL  
LAW CORPORATION  
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(702) 794-0373  
Attorney for Debtors  
Nevada State Bar no. 3048

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

\* \* \* \* \*

In re: \_\_\_\_\_ ) BANKRUPTCY NUMBER:  
                  ) BK-S-08-15651-MKN  
LEOBARDO GONZALEZ and,     ) Chapter 13  
SYLVIA MONTIEL,             ) Date: 9/30/09  
                  ) Time: 1:30 p.m.

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**OPPOSITION TO MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY**

Come now, Debtors, by and through their attorney, THOMAS E. CROWE, ESQ., and oppose Wells Fargo Bank's Motion to terminate the Automatic Stay. Said opposition is made and based upon the Points and Authorities attached hereto, the pleadings and papers on file herein and oral argument at the time of hearing of this matter.

DATED this 10<sup>th</sup> day of September, 2009.

THOMAS E. CROWE PROFESSIONAL  
LAW CORPORATION

By /s/ THOMAS E. CROWE  
THOMAS E. CROWE, ESQ.  
7381 W. Charleston Blvd.  
Suite 110  
Las Vegas, Nevada 89117  
Attorney for Debtors

**POINTS AND AUTHORITIES**

Debtors filed for relief under Chapter 13 on or about May 30, 2008. The Debtors herein oppose the Motion for Relief from Automatic Stay filed herein by WELLS FARGO BANK, by and through its attorney, GREGORY L. WILDE, ESQ., based upon the following points.

The Debtors request mortgage loan modification mediation.

Therefore, Debtors respectfully request that the Motion For Relief From the Automatic Stay be denied.

DATED this 10<sup>th</sup> day of September, 2009.

Respectfully Submitted,

THOMAS E. CROWE PROFESSIONAL  
LAW CORPORATION

/s/ THOMAS E. CROWE  
THOMAS E. CROWE, ESQ.  
Nevada State Bar No. 3048  
7381 W. Charleston Blvd.  
Suite 110  
Las Vegas, NV 89117  
Attorney for Debtors

**CERTIFICATE OF MAILING OF RE: OPPOSITION TO MOTION FOR RELIEF**  
**FROM AUTOMATIC STAY**

I, PAMELA POULSEN, hereby certify that a copy of the OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY filed herein, in the above-entitled case, was mailed by me on the 10<sup>th</sup> day of September, 2009, by depositing copies thereof in a sealed envelope, first-class postage prepaid, in the United States Mail, to the parties and addresses as follows:

Gregory L. Wilde, Esq.  
208 S. Jones Blvd.  
Las Vegas, NV 89107

Mark S. Bosco, Esq.  
2525 East Camelback Road  
Suite 300  
Phoenix, AZ 85016

Rick Yarnall  
Chapter 13 Trustee  
701 Bridger Ave., #820  
Las Vegas, NV 89101

DATED this 10<sup>th</sup> day of September, 2009.

/s/ PAMELA POULSEN  
PAMELA POULSEN, an employee of  
THOMAS E. CROWE PROFESSIONAL  
LAW CORPORATION

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